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Department of Energy

Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

March 24, 1998

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency, Region X
1200 Sixth Avenue
Seattle, WA 98101

Mr. Dean Nygard, Acting Bureau Chief
Idaho Department of Health and Welfare
Division of Environmental Quality
Community Services
1410 North Hilton
Boise, ID 83706-1255

SUBJECT: Central Facilities Area (CFA) Sewage Treatment Plant D&D - (OPE-ER-47-98)

Dear Mr. Nygard and Mr. Pierre:

This letter documents the discussion and proposed plan among the WAG 4 managers (Keith Rose, EPA; Clyde Cody, DEQ; Carol Hathaway, DOE; and Steve McCormick, LMITCO) and the D&D counterparts (Brad Frazee, LMITCO and Andy Mikkola, DOE) for demolition of the CFA Sewage Treatment Plant (STP). It also serves as notification that the D&D activities (taken outside the FFA/CO) will be operating in and around WAG 4 CERCLA site CFA-08 beginning in April. The CERCLA and D&D personnel involved will communicate status type information to the agency WAG managers as it becomes available.

As stated in LMITCO's NEPA Document Approval Form for D&D of the STP: "D&D activities as defined in Section B must not interfere with the CERCLA site as defined in the OU 4-13 Work Plan. The 4-13 Comprehensive RI/FS Work Plan identifies OU 4-08 as *potential releases* from the components of the CFA-08 sewage treatment plant (CFA-691), the old Navy septic tank (CFA-716), drying beds and drainfields. It also includes the perched water residue in the sedimentary interbeds below and adjacent to the drainfield, and surface soils downwind of the CFA-08 sewer system." It is not anticipated that any incidental soil removed during D&D activities would interfere with implementation of the RI/FS.

In the D&D Environmental Checklist, #8 it states: "All solid waste generated must have a hazardous waste determination in accordance with RCRA 40 CFR 262.11....Samples would be managed per 261.4(e)." There have been 25 samples taken from 12 boreholes around the STP structures. This sampling did not indicate any release to the soils. In the sludge bed the samples

show no mixed waste or hazardous waste releases. If an area of soil contamination is located in the CERCLA soils, a conference call would be held with the agencies to discuss the information to determine a path forward.

Current funded FY-98 plans for the D&D of the CFA Sewage Treatment Plant are the removal of CFA-691, CFA-766 Auxiliaries (digester, trickle filter, primary and secondary clarifiers), and the sludge drying beds. After the Sewage Treatment Plant is removed, soil under the structures will be sampled by the D&D Program in accordance with CERCLA protocol, for the presence of contaminants of potential concern associated with the area. This will clarify several issues for the Comprehensive ROD.

Planned for FY-99 (funding dependant) are the CFA-657, CFA-716 and the piping to the drain field. Any contamination detected after completion of the D&D action will be appropriately addressed in the WAG 4 Comprehensive ROD or subsequent FFA/CO review. In October, 1998, we will determine if funding is available to complete the D&D action prior to the late 1999 ROD date. If funding is not available, the FFA/CO RPM's will address this issue. The post D&D Sampling and Analysis Plan will be provided to the agencies for review and comment prior to finalization.

If you have any questions or need for further information please contact Carol Hathaway at 208-526-4940 or me at 208-526-4392.

Sincerely,



Kathleen E. Hain, Manager
Environmental Restoration Program

cc: Keith Rose, EPA, ECL-111, 1200 Sixth Avenue, Seattle, WA 98101,
David Hovland, IDHW, 1410 North Hilton, Boise, ID 83706
Clyde Cody, 1410 North Hilton, Boise, ID 83706